

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
KATRINA D. WILLIAMS)	Case No. 17-30117-KLP
)	Chapter 13
Debtor)	

MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on January 9, 2017.

2. The Debtor has applied for and Movement Mortgage has approved a loan to the Debtor in the amount of \$182,631.00.00 plus interest at 2.750% per annum to be repaid with 360 equal monthly payments of approximately \$1,044.45 for principal, interest, and escrow for the purchase of a home located at 2807 Pine Meadows Circle, Chesterfield VA 23831-5263, more particularly described as

ALL THAT CERTAIN OR PARCEL OF LAND WITH THE IMPROVEMENTS
THEREON AND APPURTENANCES THERETO BELONGING, LYING,
BEING AND SITUATE IN BERMUDA MAGISTERIAL DISTRICT,
CHESTERFIELD COUNTY, VIRGINIA, DESIGNATED AS LOT 6, BLOCK
B, SECTION 2, CRADDOCK POINT SUBDIVISION, Parcel
ID: 798650526700000

(the "Property").

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

3. The purchase price of the Property is \$186,000.00. The closing costs are to be paid by the Debtor.
4. There will be no loan proceeds payable to the Debtor.
5. The purchase of the Property is in the best interest of the Debtor and will facilitate the Debtor's ability to perform under her Chapter 13 Plan filed herein.
6. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

KATRINA D. WILLIAMS

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

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)	Chapter 13
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing to be scheduled for **January 27, 2021 at 10:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: January 14, 2021

KATRINA D. WILLIAMS

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
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Counsel for Debtor

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/s/ James E. Kane
James E. Kane

Label Matrix for local noticing

PRA Receivables Management LLC

UST smg Richmond

0422-3

POB 41067

Office of the U. S. Trustee

Case 17-30117-KLP

Norfolk, VA 23541-1067

701 East Broad St., Suite 4304

Eastern District of Virginia

Richmond, VA 23219-1849

Richmond

Thu Jan 14 15:38:27 EST 2021

United States Bankruptcy Court

1st Advantage Fcu

1st Advantage Fcu

701 East Broad Street

110 Cybernetics Way

PO Box 2116

Richmond, VA 23219-1888

Yorktown, VA 23693-5615

Newport News, VA 23609-0116

(p)CAPITAL ONE

Cavalry Portfolio Serv

Cavalry SPV I, LLC

PO BOX 30285

Po Box 27288

500 Summit Lake Drive, Ste 400

SALT LAKE CITY UT 84130-0285

Tempe, AZ 85285-7288

Valhalla, NY 10595-2321

Commonwealth of Virginia

Credit One Bank Na

Edward Smith

Department of Taxation

Po Box 98875

1107 Althea Parkway

P.O. Box 2156

Las Vegas, NV 89193-8875

Richmond, VA 23222-5103

Richmond, VA 23218-2156

LVNV Funding, LLC its successors and assigns

Luther Appliance & Furniture

MIDLAND FUNDING LLC

assignee of FNEM, LLC

129 Oser Ave Ste A

PO BOX 2011

Resurgent Capital Services

Hauppauge, NY 11788-3813

WARREN, MI 48090-2011

PO Box 10587

Greenville, SC 29603-0587

Mccarthy Burgess & Wol

Nissan

(p)NISSAN MOTOR ACCEPTANCE CORPORATION

26000 Cannon Rd

POB 660366

LOSS RECOVERY

Cleveland, OH 44146-1807

Dallas, TX 75266-0366

PO BOX 660366

DALLAS TX 75266-0366

OneMain

Onemain Financial

Pediatric Center

PO Box 3251

6801 Colwell Blvd

10571 Telegraph Rd.

Evansville, IN 47731-3251

Irving, TX 75039-3198

Suite 110

Glen Allen, VA 23059-4652

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

Richfield Place Apartments

Synch/jcp

PO BOX 41067

6001 Grammercy Circle

Po Box 965007

NORFOLK VA 23541-1067

Richmond, VA 23227-2328

Orlando, FL 32896-5007

Virginia Credit Union

Virginia Department of Tax

James E. Kane

P.O. Box 90010

P.O. Box 1115

Kane & Papa, PC

Richmond, VA 23225-9010

Richmond, VA 23218-1115

1313 East Cary Street

P.O. Box 508

Richmond, VA 23218-0508

Katrina Delores Williams

Suzanne E. Wade

5818 Glascock Court

341 Dial 877-996-8484 Code 2385911

Henrico, VA 23227-2312

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23226-3770

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One Bank Usa N
15000 Capital One Dr
Richmond, VA 23238-0000

Nissan Motor Acceptance
990 W 190th St
Torrance, CA 90502-0000

Portfolio Recovery Associates, LLC
PO Box 41067
Norfolk, VA 23541

(d)Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)1st Advantage Fcu
00000-0000

(d)Virginia Credit Union Inc
PO Box 90010
Richmond, VA 23225-9010

End of Label Matrix	
Mailable recipients	28
Bypassed recipients	2
Total	30